

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

Edward Butowsky,

Plaintiff,

v.

Michael Isikoff, Ellen Ratner, and
Verizon Communications, Inc.,

Defendants.

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CIVIL ACTION NO. 4:20-cv-00542

**NOTICE OF STIPULATION AND VOLUNTARY DISMISSAL OF DEFENDANTS
MICHAEL ISIKOFF AND VERIZON COMMUNICATIONS INC. WITH PREJUDICE**

This Stipulation is between plaintiff Edward Butowsky (“Butowsky”) and defendants Michael Isikoff and Verizon Communications Inc. (together as “Defendants”). On or about July 14, 2020, Butowsky filed a complaint entitled, *Butowsky v. Isikoff, et. al.*, Case No. 4:20-cv-00542 (“*Butowsky Lawsuit*”) [Docket #1], alleging causes of action for defamation and business disparagement. Counsel for Defendants advised counsel for Butowsky that Defendants intend to file a motion to dismiss for lack of personal jurisdiction (Rule 12(b)(2)) and for failure to state a claim for which relief can be granted (Rule 12(b)(6)). In order to avoid the expense and time for Defendants to file such motions, the Parties have agreed to enter into this Stipulation whereby Butowsky has agreed to dismiss Defendants from the *Butowsky Lawsuit* with prejudice.

IT IS HEREBY STIPULATED AND AGREED that pursuant to FRCP 41(a)(1)(A), Butowsky voluntarily dismisses, with prejudice, all of his claims against Defendants. Each Party

agrees to bear their own costs and to not seek further claims against each other in connection with the *Butowsky Lawsuit*.

AGREED TO BY:

DATED: October 16, 2020

/s/ Ty Clevenger
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DATED: October 16, 2020

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